

# **Exhibit A**



Wilson Sonsini Goodrich & Rosati  
Professional Corporation  
One Market Plaza  
Spear Tower, Suite 3300  
San Francisco, CA 94105  
O: 415-947-2000

JUSTINA K. SESSIONS  
415-947-2197  
jsessions@wsgr.com

August 10, 2022

**VIA ELECTRONIC TRANSMISSION**

Theodore Maya  
tmaya@ahdootwolfson.com  
Ahdoot & Wolfson, PC  
2600 W. Olive Avenue, Suite 500  
Burbank, California 91505  
Tel.: (310) 474-9111

**Re: *In re Google Digital Advertising Litigation*, 1:21-md-03010 (PKC)**

Counsel:

On behalf of Google LLC (“Google”), it has come to our attention that despite extensive and reasonable steps taken to prevent disclosure of privileged information, Google inadvertently produced the privileged documents set forth in the Appendix below. The inadvertent production of these documents does not constitute a waiver of any privilege or protection applicable to these documents or subject matter contained therein. We seek return, sequestration, or destruction of these documents consistent with Paragraph 12(c) of the Confidentiality Order, ECF No. 297.

We request that all Parties promptly confirm that they will delete or sequester any copies of these documents and that they have been permanently removed or sequestered from any databases. To facilitate the removal or sequestration of these documents, we enclose in the accompanying email a secure link to a replacement production providing either slip sheets or partially redacted documents for the inadvertently produced documents.

Please provide written confirmation in no later than three business days that you have deleted or sequestered the documents in the Appendix, which contains the basis of the privilege asserted pursuant to Paragraph 12(c) of the Confidentiality Order.

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Sincerely,

/s/ Justina Sessions  
Justina Sessions

*Counsel for Defendants  
Google LLC, Alphabet Inc., and YouTube, LLC*

Copies to:

Eric Mahr  
eric.mahr@freshfields.com  
FRESHFIELDS BRUCKHAUS DERINGER US LLP  
700 13<sup>th</sup> Street, NW  
10th Floor  
Washington, DC 20005  
Tel.: (202) 777-4545

Kevin J. Orsini  
korsini@cravath.com  
Cravath, Swaine & Moore LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
Tel.: (212) 474-1596

Caitlin Goldwater Coslett  
ccoslett@bm.net  
Berger Montague PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Tel.: (215) 875-3057

Eric J. Maier  
emaier@kellogghansen.com  
Kellogg, Hansen, Todd, Figel, & Frederick, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, DC 20036  
Tel.: (202) 326-7923

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SONSINI**

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Stuart Davidson  
sdavidson@rgrdlaw.com  
Robins Geller Rudman & Dowd LLP  
120 East Palmetto Park Road, Suite 200  
Boca Raton, FL 33432  
Tel.: (561) 750-3000

Jonathan Rubin  
jrubin@moginrubin.com  
MoginRubin LLP  
1615 M Street, NW, Third Floor  
Washington, DC 20036  
Tel.: (202) 630-0616

Fred T. Isquith, Jr.  
fisquith@zsz.com  
Zwerling, Schachter & Zwerling, LLP  
41 Madison Avenue  
New York, NY 10010  
Tel.: (212) 223-3900

Kate M. Baxter-Kauf  
kmbaxter-kauf@locklaw.com  
Lockridge Grindal Nauen P.L.L.P.  
100 Washington Avenue S., Suite 2200  
Minneapolis, MN 55401  
Tel.: (612) 339-6900

Zeke DeRose III  
zeke.derose@lanierlawfirm.com  
The Lanier Law Firm  
10940 W. Sam Houston Pkwy N, Suite 100  
Houston, TX 77064  
Tel.: (713) 659-5200

Jason Zweig  
jaz@kellerpostman.com  
Keller Postman LLC  
150 N. Riverside Plaza, Suite 4100  
Chicago, IL 60606  
Tel.: (312) 216-8667

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Appendix

| Begin Bates Number |                  | Privilege Asserted                                  |
|--------------------|------------------|---|
| GOOG-DOJ-06509724  | GOOG-NE-06506462 | Attorney-Client Privilege                           |
| GOOG-DOJ-06513731  | GOOG-NE-06510469 | Attorney-Client Privilege                           |
| GOOG-DOJ-06513911  | GOOG-NE-06510649 | Attorney-Client Privilege                           |
| GOOG-DOJ-06513923  | GOOG-NE-06510661 | Attorney-Client Privilege                           |
| GOOG-DOJ-06513935  | GOOG-NE-06510673 | Attorney-Client Privilege                           |
| GOOG-DOJ-06514594  | GOOG-NE-06511332 | Attorney-Client Privilege                           |
| GOOG-DOJ-06514607  | GOOG-NE-06511345 | Attorney-Client Privilege                           |
| GOOG-DOJ-06514620  | GOOG-NE-06511358 | Attorney-Client Privilege                           |
| GOOG-DOJ-06514633  | GOOG-NE-06511371 | Attorney-Client Privilege                           |
| GOOG-DOJ-06516201  | GOOG-NE-06512939 | Attorney-Client Privilege                           |
| GOOG-DOJ-06588651  | GOOG-NE-06585389 | Attorney-Client Privilege                           |
| GOOG-DOJ-06588652  | GOOG-NE-06585390 | Attorney-Client Privilege                           |
| GOOG-DOJ-06588654  | GOOG-NE-06585392 | Attorney-Client Privilege                           |
| GOOG-DOJ-06588656  | GOOG-NE-06585394 | Attorney-Client Privilege                           |
| GOOG-DOJ-06884551  | GOOG-NE-06881289 | Attorney-Client Privilege                           |
| GOOG-DOJ-07618131  | GOOG-NE-07614869 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-08154428  | GOOG-NE-08151166 | Attorney-Client Privilege                           |
| GOOG-DOJ-09000970  | GOOG-NE-08997708 | Attorney-Client Privilege                           |
| GOOG-DOJ-09088857  | GOOG-NE-09085595 | Attorney-Client Privilege                           |
| GOOG-DOJ-09092627  | GOOG-NE-09089365 | Attorney-Client Privilege                           |
| GOOG-DOJ-09094865  | GOOG-NE-09091603 | Attorney-Client Privilege                           |
| GOOG-DOJ-09099300  | GOOG-NE-09096038 | Attorney-Client Privilege                           |
| GOOG-DOJ-09099310  | GOOG-NE-09096048 | Attorney-Client Privilege                           |
| GOOG-DOJ-09116931  | GOOG-NE-09113669 | Attorney Work Product                               |
| GOOG-DOJ-09185767  | GOOG-NE-09182505 | Attorney-Client Privilege                           |
| GOOG-DOJ-09215178  | GOOG-NE-09211671 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-09750661  | GOOG-NE-09747154 | Attorney-Client Privilege                           |
| GOOG-DOJ-09829583  | GOOG-NE-09826076 | Attorney-Client Privilege                           |
| GOOG-DOJ-09905380  | GOOG-NE-09901873 | Attorney-Client Privilege                           |
| GOOG-DOJ-09999660  | GOOG-NE-09996153 | Attorney-Client Privilege                           |
| GOOG-DOJ-10308209  | GOOG-NE-10304702 | Attorney Work Product                               |

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| Begin Bates Number |                  | Privilege Asserted                                  |
|--------------------|------------------|---|
| GOOG-DOJ-10308464  | GOOG-NE-10304957 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10962922  | GOOG-NE-10990537 | Attorney Work Product                               |
| GOOG-DOJ-10963552  | GOOG-NE-10991167 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963555  | GOOG-NE-10991170 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963558  | GOOG-NE-10991173 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963561  | GOOG-NE-10991176 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963564  | GOOG-NE-10991179 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963567  | GOOG-NE-10991182 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10963570  | GOOG-NE-10991185 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-10968812  | GOOG-NE-10996427 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-11284588  | GOOG-NE-11312293 | Attorney-Client Privilege                           |
| GOOG-DOJ-11330398  | GOOG-NE-11358103 | Attorney-Client Privilege                           |
| GOOG-DOJ-11698798  | GOOG-NE-11726287 | Attorney-Client Privilege                           |
| GOOG-DOJ-11794531  | GOOG-NE-11822020 | Attorney Work Product                               |
| GOOG-DOJ-11794570  | GOOG-NE-11822059 | Attorney Work Product                               |
| GOOG-DOJ-11795403  | GOOG-NE-11822892 | Attorney Work Product                               |
| GOOG-DOJ-11795615  | GOOG-NE-11823104 | Attorney Work Product                               |
| GOOG-DOJ-12064157  | GOOG-NE-12091646 | Attorney Work Product                               |
| GOOG-DOJ-12527426  | GOOG-NE-12554915 | Attorney-Client Privilege                           |
| GOOG-DOJ-12764938  | GOOG-NE-12792427 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12764939  | GOOG-NE-12792428 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12765100  | GOOG-NE-12792589 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12765939  | GOOG-NE-12793428 | Attorney-Client Privilege;<br>Attorney Work Product |

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| Begin Bates Number |                  | Privilege Asserted                                  |
|--------------------|------------------|---|
| GOOG-DOJ-12765994  | GOOG-NE-12793483 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12765995  | GOOG-NE-12793484 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12765996  | GOOG-NE-12793485 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12765998  | GOOG-NE-12793487 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766000  | GOOG-NE-12793489 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766002  | GOOG-NE-12793491 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766005  | GOOG-NE-12793494 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766008  | GOOG-NE-12793497 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766017  | GOOG-NE-12793506 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766021  | GOOG-NE-12793510 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12766025  | GOOG-NE-12793514 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12864699  | GOOG-NE-12892188 | Attorney-Client Privilege;<br>Attorney Work Product |
| GOOG-DOJ-12866023  | GOOG-NE-12893512 | Attorney Work Product                               |
| GOOG-DOJ-13462965  | GOOG-NE-13462331 | Attorney-Client Privilege                           |